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United States District Court
Northern District of California, San Jose Division

VERIGY U.S. INC., a Delaware corporation Case No. 5:07-cv-04330 (RMW) (HRL)

Plaintiff,

VS.

ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual;
SILICON TEST SYSTEMS INC., a
California corporation; SILICON TEST
SOLUTIONS LLC, a California limited
liability corporation,

Defendants.

Case No. 5:07-cv-04330 (RMW) (HRL)

Defendants' Administrative Motion for Leave to File Exhibit C to the Letter Brief re: Motion to Compel Disk Drive Discovery Under Seal

Judge: Hon. Howard R. Lloyd

) Ctrm: 2

) Complaint filed: August 22, 2007

Trial Date: None Set

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1 Pursuant to Civil Local Rules 7-11 (a) and 79-5(b), Defendants (Romi Omar Mayder, Wesley
2 Mayder, Silicon Test Systems, Inc., a California Corporation; Silicon Test Solutions LLC, A
3 California Limited Liability Corporation) request that the following materials be filed under seal, as
4 they contain confidential information that is protected by the Stipulated Protective Order entered by
5 the Court on August 29, 2007. The documents submitted under seal include:
6

- 7 1. Exhibit C to Defendants Letter Brief discussing Plaintiffs proposed search terms. (the
8 Exhibit)

9 The Exhibit has been designated as "Highly Confidential-Attorneys' Eyes Only" as Plaintiff
10 has previously requested protection for the codenames of its projects. Defendants reserve their right
11 to challenge such designations pursuant to the Stipulated Protective Order. Although the information
12 in the Exhibit has been designated as protected from disclosure under the Protective Order,
13 Defendants rely on this information in support of its Letter Brief. The parties' confidentiality interest
14 therefore overcomes the right of public access to the record, as a substantial probability exists that the
15 parties' overriding confidentiality interest will be prejudiced if the record is not sealed. Further, the
16 proposed sealing is narrowly tailored and no less restrictive means exist to achieve this overriding
17 interest
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19 Pursuant to Local Civil Rule 79-5(b)-(c), Defendants lodge the Exhibit with this Court, and
20 respectfully request leave to file the aforementioned documents under seal.
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22 Respectfully submitted
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24 Dated: October 22, 2007
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Mount & Stoelker, P.C.
Daniel H. Fingerman

26 /s/
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28 Attorneys for Defendants Romi Mayder, Wesley Mayder,
Silicon Test Systems Inc., and Silicon Test Solutions LLC